

Fill in this information to identify the case:

Debtor 1	Clair E Kelly
Debtor 2 (Spouse, if filing)	Brenda S Kelly
United States Bankruptcy Court for the: <u>Western</u> District of <u>PA</u> (State)	
Case number <u>16-70837-JAD</u>	

Form 4100R**Response to Notice of Final Cure Payment****10/15**

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor:	<u>Carrington Mortgage Services, LLC</u>	Court claim no. (if known): <u>6-1</u>
Last 4 digits of any number you use to identify the debtor's account: <u>2 6 0 4</u>		
Property address:	<u>233 Hillcrest St</u> Number Street	
<u>Northern Cambria, PA 15714</u> City State ZIP Code		

Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 03 / 01 / 2022
MM / DD / YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____

c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: _____ / _____ / _____
MM / DD / YYYY

Debtor 1 Clair E Kelly
First Name Middle Name Last Name

Case number (if known) 16-70837-JAD

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

I am the creditor.
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/ Elizabeth K. Holdren

Date 03 / 23 /2022

Signature

Print Elizabeth K. Holdren Title Creditor's Counsel
First Name Middle Name Last Name

Company Hill Wallack LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 21 Roszel Road, P.O. Box 5226
Number Street

Princeton, NJ 08543
City State ZIP Code

Contact phone (609) 734 – 6345 Email eholdren@hillwallack.com

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(JOHNSTOWN)

IN RE:
Clair E Kelly
Brenda S Kelly
Debtor

Carrington Mortgage Services, LLC
Movant

v.
Clair E Kelly
Brenda S Kelly
Respondent

CHAPTER 13
CASE NO.: 16-70837-JAD

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served or caused to be served the above-captioned pleading, Response to Notice of Final Cure, on the parties below via First-Class Mail and Electronic Notification on March 23, 2022.

Clair E. Kelly
233 Hillcrest Street
Northern Cambria, PA 15714
Debtor
Via Regular Mail

Brenda S. Kelly
233 Hillcrest Street
Northern Cambria, PA 15714
Debtor
Via Regular Mail

Kenneth P. Seitz, Esquire
P.O. Box 211
Ligonier, PA 15658
Debtor's Counsel
Via ECF

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Chapter 13 Trustee
Via ECF

United States Trustee
Office of the U.S. Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222
U.S. Trustee
Via ECF

Respectfully submitted,
/s/Elizabeth K. Holdren, Esquire
Elizabeth K. Holdren, Esq., Atty ID
Hill Wallack LLP
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